

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

KENNETH HOLLAND,)
Plaintiff)
)
) C.A. No. 05-464-SLR
v.)
)
STANLEY TAYLOR, et al)
Defendants)

PLAINTIFF'S ANSWER TO DEFENDANT'S FIRST SET OF INTERROGATORIES



A. 1. Agree
2. Agree
3. Agree
4. Agree
5. Agree
6. Agree

B. Plaintiff has subpoenaed all records that are required to answer the herein interrogatories. Defendant's have not yet responded to said subpoena's and such documents are necessary to fulfill the herein requested items. Once documents are received all interrogatories will be answered accordingly, as will the Request for Production.

1. All communication is clearly stated within the original petition and not protected.
2. See B-1
3. See B-1

INTERROGATORIES

1. A. While in MCC Petitioner was given disciplinary sanctions for an incident report in which he requested to be present at the hearing. The hearing was held the next day while Petitioner was at work and Petitioner was denied his Due Process Rights and inappropriately sanctioned to 14 days at the S-VOP instead of the 5 day legal limit and the 14 day sanction was followed by being sent to C-VOP to await bed space back at MCC. Petitioner waited five months to be transferred back to work release at MCC while many other inmates came in after him and left before him. This indicates that Petitioner was in fact not put on the waiting list in a timely fashion.

b. While at S-VOP Petitioner was denied the right to appeal his sanctions by staff and therefore clearly violated his Due Process Rights under the 5th and 14th amendments of the United States Constitution.

C. Said persons named in the original petition have specific knowledge accordingly. Repeating such information would be redundant. Each witness and/or person with any knowledge will be subpoenaed for deposition and interrogatories accordingly.

D.

1. Including, but not limited to Incident Reports, Appeal Requests/answers/denial of right to appeal. Grievance forms, medical records and request for medical treatment, staff statements, transfer records, waiting lists, inmate progress reports, work history/job evaluations/employment records, and computation sheets.

2. Documents listed in D above will be entered into discovery once obtained from the Department of Corrections, et al.

3. All witnesses listed in the original petition have knowledge and/or witnessed certain incidents as specified.

4. Medical records and Department of Corrections records will be entered into evidence accordingly as obtained.

5. Dr. Cancino, Josefina Luisa, MD Family Medicine Specialist Dr. Bruce Fisher, MD

6. a. Kenneth L. Holland
b. 221-58-6765
c. 5-15-1970
d. Lewis, DE
e. 9th grade

7. Criminal Record attached

8. 1998-99 Walmart
1999 Playtex

9. Petitioner has not been seen by any Physicians in the past ten years until the injury related to the herein action.

10. None

11. Broken Jaw and because it was not timely treated now requires surgery and permanent damage, pain and suffering.
12. Medical treatment was denied to Petitioner while in the custody of the DOC. Petitioner obtained his own diagnosis and treatment after his release at Bay Health, 10/20/2005 - see attached treatment report from Bay Health Medical Center. Still under medical care for said injury.
13. Timely filing of Grievance was denied while Petitioner in custody of DOC and Lock Up and therefore Petitioner was unable to timely file.
14. Compensatory Damages are not yet determined as Petitioner is still seeking medical treatment and does not have medical insurance. Current bills attached of which Petitioner has paid personally.
15. NO
16. NO

Respectfully Submitted.



Kenneth Holland, Pro Se




4/24/06
Joni L. Johnson, Notary Public
State of Delaware my commission
expires 6/16/09

CERTIFICATE OF SERVICE

I, Kenneth Holland hereby certify that on April 19, 2006, I placed in the United States Mail Depository a true and correct copy of the Answers to Interrogatories to all defendants listed herein:

Department of Corrections
Vincent Bianco
Michael Costello
Adam Bramble
Barbara Costello
Helen Moore
Stephen Devine
Robert George
Stan Taylor

Kenneth Holland X
Kenneth Holland

4/24/06



Joni Johnson, Notary Public
of the State of Delaware 4/24/06
My Commission Expires
May 10, 2009

Kenneth C. Hollings
211 North New St.
Dover, Delaware

1401



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Office of the Clerk
United States District
Court,
844 N. King Street, Newark,
Delaware

First class